

October 5, 2011

Mr. Craig C. Cross, MPPA
Staff Environmental Scientist
California Department of Water Resources
Division of Integrated Regional Water Management
901 P Street, Bonderson Building, Room 213-A
Sacramento, CA 95814-6418

Subject: **Comments on the Draft Funding Recommendations for Proposition 1E Round 1 Stormwater Flood Management Grant Program, Released on September 21, 2011**

Dear Mr. Cross:

The City of Fortuna appreciates the diligent work of the Department of Water Resources (DWR) staff for administering the Proposition 1E Stormwater Flood Management (SWFM) Round 1 Grant Program. The City was delighted to learn the City efforts expended into gathering objective data and identifying the full scope of the project as well as completing the grant application have resulted in the City's project being selected by DWR for partial funding through the Proposition 1E SWFM Program.

However, the City of Fortuna believes strongly that DWR should reconsider and fully fund the City's Proposition 1E SWFM grant request. The City initially requested \$3,394,652 in grant funds to match \$3,507,112 in local funds to implement the improvement project. It would be challenging for the City of Fortuna to achieve the project goals of addressing storm water flooding in a disadvantaged neighborhood, seismically retrofitting creek crossing bridges, enhancing salmonid populations and reducing erosion and sediment loads as stated in the application without the full funding requested. Especially difficult will be revising the current project scope of work to fit within the reduced funding amount and still meet the project goals for the City and assure all the benefits that DWR ranked the City's project on can still be attained.

Proposition 1E, the Disaster Preparedness and Flood Prevention Bond Act of 2006, authorized the Legislature to appropriate \$300,000,000 for grants for SWFM projects. The targeted available funding in Proposition 1E SWFM Round 1 was \$212,000,000. Of that total only \$163,248,000 was recommended by DWR for funding on the draft funding recommendations list, released on September 21, 2011.

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It appears based on DWR's draft funding recommendations list that not all of the \$100,000,000 in funds targeted by DWR "for projects that address immediate public health and safety needs and strengthen existing flood control facilities to address seismic safety issues" were allocated to projects. The City's proposed project includes replacement of at least 3 undersized bridges that cross Rohner Creek, all of which do not meet current seismic standards and reduce the channel's stormwater carrying capacity, as discussed in Attachment 9 of the application. If these bridges fail during an earthquake and/or high water flow event, they will obstruct the channel causing a backwater effect that will exacerbate flooding in adjacent neighborhoods and commercial areas. One option to restore the City's full grant request is to fund the remaining 29% out of the seismic safety targeted funds. While it is recognized that the existing bridges may not pose an immediate public health threat, it is reasonable to use this funding source to meet the City's full grant request as there are real seismic issues with the existing structures built in the 1950's and 1960's. The seismic retrofit of these creek crossing bridges is a very important part of the City's project.

Another option strongly supported by the City would be to forward funds from the planned Proposition 1E Round 2 allocation to Round 1 to make the City's grant request whole. The City of Fortuna's project was the only one on the Round 1 draft recommendations list to not be funded at 100% of the full grant request.

The City appreciates DWR consideration of this request. It is very important to the City, its residents, and the region to restore full funding to the City of Fortuna's Rohner Creek Flood Control and Riparian Habitat Improvement Project to ensure all the benefits described for the project in the grant application can be achieved.

Sincerely,



Duane V. Rigge
City Manager

Attachments: Attachment A - Response to Review Comments - (2 pages)
Letter from the North Coast Integrated Regional Water Management Plan (NCIRWMP)
Policy Review Panel (PRP) – (2 pages)

ATTACHMENT A: RESPONSE TO REVIEW COMMENTS

This attachment presents some additional information to support the current ranking and possible increased ranking of the City of Fortuna's Rohner Creek Flood Control and Riparian Habitat Improvement Project under the Proposition 1E Stormwater Flood Management (SWFM) Grant Program. In general the City agrees with most of the comments made by the reviewer and appreciates the time invested to review all the application materials. There are some areas the City believes a higher ranking is justified. Where this is the case, a review of information included in the grant application is presented and discussed below. This attachment is arranged by proposal scoring criteria.

Work Plan

The City is continuing to develop Rohner Creek Flood Control and Riparian Habitat Improvement Project. As discussed in the work plan, the City has completed Tasks 5 and 6 in the Scope of Services, Preliminary Hydrologic and Hydraulic Model Development and Analysis and the Final Hydrologic and Hydraulic Model Development respectively. The Final Hydrologic and Hydraulic Modeling discussed in Task 6 showed three alternatives that can effectively increase carrying capacity and reduce flooding. These alternatives as presented in the work plan Task 6 are:

- New off channel bypass culvert/swale near Fortuna High School
- New off channel bypass Culvert/swale along Fortuna Boulevard
- Channel widening/terracing

Thus, the City is confident that the proposed work plan will result in a feasible to construct alternative which will reduce flooding in the project area, and the City believes the project work plan could have been scored higher on this criteria.

Budget

The reviewer requests more information on breakdown of costs for quarterly, annual, and final reports. A description of the work to complete these reports is documented in the Work Plan Task 1 and timing of report submission is detailed on the project schedule (Attachment 5). The hours presented for Task 1 Administration took into account the effort described in the work plan and laid out in the schedule, and thus the City believes this cost category is fully support. This is similar to other tasks where significant effort went into the development of the work plan which was then reflected in the hours estimates in the budget. The City believes the project budget could have been scored higher on this criterion.

Monitoring, Assessment, and Performance Measures

The reviewer states this criterion is fully addressed, however they do not think the criterion are supported by thorough documentation or sufficient rational. The only item mentioned as missing is the outcome indicator for two of the eight measures. For the "Improving water quality in Rohner Creek and the downstream water bodies" performance measure, the outcome indicator was very similar to the target whereby the outcome will be known once the measurements are taken and the reduction in loads calculated. For the "Reduced potential for seismic event related change in flood damage" performance measure, the outcome indicator was the same as the measurement tools and methods. While it is unfortunate that this information did not make it into the grant application, the information

included in the other columns for each performance measure shows that the City has outcome indicators adequate to evaluate change resulting from the work. Thus, the City believes the project could have been scored higher on this criterion.

Economic Analysis – Flood Damage Reduction (FDR) and Water Supply Benefits

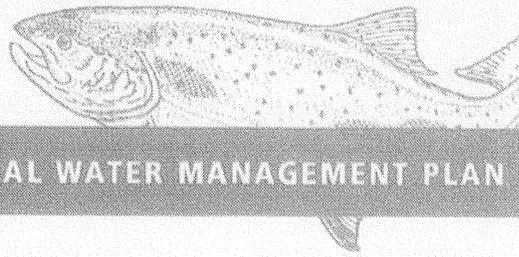
The City takes no issue with the scoring of this criterion. However the reviewer did mention seismic benefits under this criterion. The City believes seismic falls under other expected benefits, and addresses this criterion in the section below.

Economic Analysis – Water Quality and Other Expected Benefits

The reviewer correctly discusses the water quality benefits that will result from the city's project. It is very difficult to put dollar values to water quality improvements. Thus this was not done for the City's project. Seismic retrofit benefits are described in detail here as well, including current condition and thresholds for failure. This item is also very difficult to put dollars values to. The data for water quality benefits was taken from the City's June 2009 study described in Task 5 of the work plan, and the seismic benefits were evaluated using the Humboldt County Operational Area Hazard Mitigation Plan published in December 2007. The City believes the project could have been scored higher on water quality and other expected benefits.

Program Preferences

As discussed under the response to work plan comments, the City has completed the Final Hydrologic and Hydraulic One Dimensional Modeling, which shows three alternatives that could be implemented to increase channel carrying capacity and reduce flooding. The City will meet the program preferences as described in the application.



NORTH COAST INTEGRATED REGIONAL WATER MANAGEMENT PLAN

Mr. Craig C. Cross, MPPA
Staff Environmental Scientist
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Division of Integrated Regional Water Management
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Sacramento, CA 95814-6418

RE: Comments on the Draft Funding Recommendations for Proposition 1E Round 1 Stormwater Flood Management Grant Program, Released on September 21, 2011

Dear Mr. Cross:

The North Coast Integrated Regional Watershed Management Plan (NCIRWMP) Policy Review Panel (PRP) would like to thank the Department of Water Resources for your hard work administering the Proposition 1E Stormwater Flood Management (SWFM) Round 1 Grant Program. The NCIRWMP was excited to learn that one of our signatories to the NCIRWMP, the City of Fortuna, was selected by DWR for partial funding through the Proposition 1E Program.

State support for projects like Fortuna's is important to achieving the goals in the NCIRWMP. The City's project is consistent with the North Coast Integrated Regional Water Management Plan, and is included on the Plan's list of projects. Making the City of Fortuna's project whole by funding the full grant request helps out the entire North Coast IRWMP region, and the mutual goals developed through our collaborative partnership.

To realize the complete benefits of the project, DWR could fully fund the City's Prop 1E grant request. The City initially requested \$3,394,652 in grants funds to match \$3,507,112 in local funds to implement the improvement project. It would be very difficult for the City of Fortuna to achieve the project goals of addressing flooding in a disadvantaged neighborhood, enhancing salmonid populations, and reducing erosion and sediment loads as stated in the application without the full funding requested.

Proposition 1E, the Disaster Preparedness and Flood Prevention Bond Act of 2006, authorized the Legislature to appropriate \$300,000,000 for grants for Stormwater/ Flood Management (SWFM) projects. The targeted available funding in Prop 1E Round 1 was \$212,000,000. Of that total only \$163,248,000 was recommended by DWR for funding on the draft funding recommendations list.

It appears based on DWR's draft funding recommendations list that not all of the \$100,000,000 in funds targeted for projects to address seismic safety issues were allocated to projects. The City's proposed project includes replacement of 3 bridges that cross Rohner Creek, all of which do not meet current seismic standards, as discussed in Attachment 9 of the application. When these bridges fail during an earthquake event they will obstruct the channel causing a backwater effect that will exacerbate flooding in adjacent neighborhoods and commercial areas. One option to restore the City's full grant request is to fund the remaining 29% out of the seismic safety targeted funds.

The NCIRWMP endorses the Rohner Creek Flood Control and Riparian Habitat Restoration Project and is grateful to DWR's ongoing support of the North Coast communities and natural resources.

Sincerely,

A handwritten signature in black ink that reads "Jake Mackenzie". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Vice Mayor Jake Mackenzie, City of Rohnert Park
Chair, NCIRWMP Policy Review Panel